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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY - 9 2005

Federal Communications Commission
Office of Secretary

In the Matter of:)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
(Milner, Ellaville, Oglethorpe)
and Plains, Georgia))

MB Docket No. 05-106
RM-11196

TO: OFFICE OF THE SECRETARY
ATTN: ASSISTANT CHIEF, AUDIO DIVISION, MEDIA BUREAU

JOINT COUNTERPROPOSAL

Radio Georgia, Inc. ("Radio Georgia"), the licensee of Station WTGA-FM, Channel 266A, Thomaston, Georgia, and Southern Broadcasting Companies, Inc. ("Southern") (collectively, the "Parties"), by and through their attorneys, and pursuant to Section 1.420(d) of the Commission's rules, 47 C.F.R. § 1.420(d)(2004), hereby submit this Joint Counterproposal (the "Counterproposal") to the Petition for Rulemaking filed by Linda A. Davidson ("Davidson") on July 3, 2003 (the "Petition"). On March 18, 2005, the Commission released a Notice of Proposed Rulemaking seeking comments on the proposal contained in the Petition.¹

As discussed in the NPRM, Davidson proposes to (1) allot Channel 290A at Milner, Georgia, (2) substitute Channel 232A for the vacant Channel 290A allotment at Ellaville, Georgia; and (3) allot Channel 290A at Plains, Georgia (herein, the "Proposal").² If the

¹ *Milner, Ellaville, and Plains, Georgia*, Notice of Proposed Rulemaking, 20 FCC Rcd 6073 (2005) (the "NPRM"). The NPRM established May 9, 2005, as the deadline for submitting comments and/or counterproposals. Therefore, this Counterproposal is timely filed. As discussed herein, the Parties propose the allotment of Channel 290A at Oglethorpe, Georgia. Therefore, it has been added to the caption provided above.

² *Id.* at ¶ 2.

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Commission were to adopt Davidson's proposals, there would be two new first-service allotments --- at Milner, Georgia, and Plains, Georgia.

As discussed in more detail below, the Parties propose a different set of allotments that will better serve the public interest. Specifically, the Parties propose that the Commission:

1. Delete the allotment of Channel 266A at Thomaston, Georgia, and allot Channel 266A at Milner, and modify the license of Station WTGA-FM to specify the new community of license of Milner, Georgia, as its first local service;
2. Allot Channel 295A at Plains, Georgia, as its first local service;
3. Allot Channel 290A at Oglethorpe, Georgia, as its first local service; and
4. Allot Channel 232A at Ellaville, Georgia, and delete the current allotment of Channel 290A.³

The grant of the Counterproposal will introduce new first local services to three communities --- Milner, Oglethorpe, and Plains --- and maintain the first local service allotment at Ellaville, Georgia, whereas the Proposal would introduce new first local service to only two communities. In addition, the Counterproposal will result in a substantial net gain in reception service as compared to the Proposal. Therefore, in light of these superior public interest benefits, the Parties urge the Commission to adopt the Counterproposal.

DISCUSSION

As noted above, Davidson proposes to allot two new local services to Milner, Georgia, and Plains, Georgia, and to revise the channel for the vacant allotment at Ellaville, Georgia. On the other hand, the Counterproposal proposes that the same two communities receive new allotments, but also that a new local service be allotted to Oglethorpe, Georgia. The addition of

³ Channel 290A at Ellaville, Georgia, has been included in the channels to be auctioned in Auction 62, which is tentatively scheduled to commence on November 1, 2005. *See Auction of FM Broadcast Construction Permits Scheduled for November 1, 2005*, Public Notice, DA 05-1076 (rel. April 14, 2005).

the proposed allotment at Oglethorpe, Georgia, will permit the introduction of a new local service to three communities, thus better serving the public interest, and also substantially increases the number of persons that will receive a new aural service.⁴

A. THE PROPOSED ALLOTMENTS COMPLY WITH THE FCC'S TECHNICAL REQUIREMENTS.

Attached hereto as Exhibit A is an Engineering Statement of du Treil, Lundin & Rackley, Inc. (the "Engineering Statement"), demonstrating that each of the proposed allotments will comply with the Commission's rules.

First, the allotment of Channel 266A to Milner for Station WTGA-FM as proposed herein is mutually exclusive with the current allotment of Channel 266A at Thomaston in compliance with Section 1.420(i) of the Commission's rules.⁵ In addition, as shown in Exhibit A, each of the allotments set forth herein complies with the minimum distance separation requirements set forth in Section 73.207 of the Commission's rules.⁶

Moreover, each of the communities for which the proposed allotments will be made qualifies as a community for allotment purposes. Initially, Davidson established the qualifications for both Plains, Georgia, and Milner, Georgia, in the Petition, and the Commission did not request additional information regarding the qualifications of these communities in the NPRM.

⁴ Currently, a Counterproposal is pending that was filed by Southern requesting that Channel 295A be allotted to Oglethorpe, Georgia, rather than 295A at Americus, Georgia, as proposed by SSR Communications, Inc. *See Consumer & Governmental Affairs Bureau Reference Information Center - Counterproposals Filed*, Public Notice, Rpt. No. 2704 (April 22, 2005). However, Southern will be filing a Request for Withdrawal of its Counterproposal today. With the voluntary dismissal of the counterproposal, Oglethorpe will not have a local aural service.

⁵ *See* 47 C.F.R. § 1.420(i) (2004).

⁶ *See* 47 C.F.R. § 73.207 (2004).

Oglethorpe also clearly qualifies as a community for allotment purposes. The city was incorporated in 1849, and has a population of 1,200 persons according to the 2000 Census.⁷ Oglethorpe has its own mayor, Gerald Beckum, and a five person elected City Counsel.⁸ Oglethorpe also has its own City Clerk and City Attorney, and the city serves as the County Seat for Macon County. Oglethorpe has its own Fire Department, its own zip code (31068), and its own post office.⁹ Oglethorpe is also home to the Macon County School System offices, and the county school system's elementary school is in Oglethorpe. As such, there can be little doubt that Oglethorpe qualifies as a community for allotment purposes.

Thus, it is clear that the Counterproposal complies with each of the Commission's technical requirements for proposals to amend the FM Table of Allotments. The Counterproposal includes all of the communities involved in the Proposal, and, as provided in the Engineering Statement, there are no short-spacing situations caused by the Counterproposal.

B. A COMPARISON OF THE PROPOSAL AND THE COUNTERPROPOSAL DEMONSTRATES A CLEAR PUBLIC INTEREST PREFERENCE FOR THE GRANT OF THE INSTANT COUNTERPROPOSAL.

Since the Proposal and the Counterproposal comply with all technical requirements established by the Commission for allotment proceedings, the Commission must compare the proposed service to the public with respect to the two proposals to determine which would result

⁷ See U.S. Census Bureau, American Factfinder, profile of General Demographic Characteristics - Oglethorpe City, Georgia.

⁸ See Information about the City of Oglethorpe, Georgia Municipal Association (<http://www.gmanet.city/citydetail/default.asp?fipscode+57736>, last visited May 8, 2005).

⁹ See United States Postal Service, Post Office Locator (<http://mapsonus.switchboard.com/bin/maps-showpoi/usi=~417045b9.691fb.5f77.9/c=2/refscr=USPS/poi+zusps:21765>, last visited May 8, 2005).

in a preferential arrangement of the FM Table of Allotments under Section 307(b) of the Communications Act of 1934, as amended.¹⁰

In comparing two mutually-exclusive allotment proposals, the Commission focuses on which proposal would provide the greatest number of communities with first local service, and also which proposal would bring service to the greatest number of persons.¹¹ If the comparison reveals that one proposal brings a greater number of first local services to communities, that proposal will be favored under Priority 3 of the Commission's allotment priorities. *Id.*

As discussed in the Engineering Statement, the Counterproposal would introduce new local service to three communities, whereas the Proposal will only provide new local service to two communities. Also, as discussed in the Engineering Statement, Thomaston, Georgia will continue to be served by a full-power AM station, WTGA(AM), Thomaston, Georgia, and no new "gray" or "white" areas will be created by the proposals contained herein.¹²

In addition, substantially more persons would receive a new aural service under the Counterproposal than would receive such service from the facilities specified in the Proposal. Specifically, Figure 2 of the Engineering Statement indicates that 11,249 more persons would receive a new aural service from the facilities specified in the Counterproposal than would receive aural service under the Proposal.

¹⁰ *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1988). The FM allotment priorities are: (1) First fulltime aural service; (2) Second fulltime aural service; (3) First local service; and (4) Other public interest matters. Co-equal weight is given to priorities (2) and (3).

¹¹ *See, e.g., Coon Valley and Westby, Wisconsin, et. al.*, 13 FCC Rcd 10240 (MMB 1998)(selecting proposal that would introduce new local service to two communities and serve greater population as compared to competing proposal that would introduce new local service to only one community.).

¹² *See Engineering Statement*, pg. 3 and Figure 2, Sheet 5.

In light of the proposed delivery of first local service to three different communities, and in light of the substantial advantage in additional population that would be served by the Counterproposal (over 11,000 persons), a comparison of the two proposals clearly establishes that the Counterproposal would better serve the public interest.

CONCLUSION

Therefore, Radio Georgia, Inc., and Southern Broadcasting Companies, Inc., urge the Commission to make the allotments specified in the Counterproposal rather than those proposed by Davidson. As demonstrated herein, the Counterproposal would deliver first local service to three communities, and the overall service to the public would be substantially greater than that offered by the Proposal and would result in a preferential arrangement of allotments.¹³

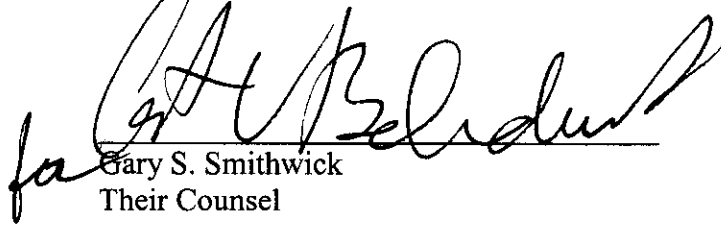
As such, the public interest would be best served by the grant of this Counterproposal. Davidson has already stated her intention to file for the Plains, Georgia, allotment. Southern hereby expresses its interest in the Oglethorpe, Georgia, Channel 290A allotment, and states its intention to file an application for the Oglethorpe allotment if this Counterproposal is granted, and if it is successful in obtaining a construction permit, to construct the facilities at Oglethorpe.

¹³ The Parties believe that this Counterproposal complies with the policy set forth in *Taccoa, Sugar Hill and Lawrenceville, GA*, 16 FCC Rcd 21191 (MMB 2001) (in the absence of a substantial justification based on new and reasonably unforeseeable events, a new or revised proposal will not be processed in the docket in which it is filed but will be dismissed or treated as a new proposal in a separate proceeding). Unlike *Taccoa*, it is not necessary for the staff to process two inconsistent proposals from the same party in a single rulemaking proceeding, as there are two separate rule making proceedings ongoing. Southern expressed interest in the use of a new FM channel at Oglethorpe, Georgia. Southern continues to express interest, but for Channel 290A rather than 295A. The release date of the NPRM was unforeseen, and explains why Southern is taking the course of action set forth in this Joint Counterproposal. As such, the proposal for the use of Channel 290A at Oglethorpe should not be processed as in a new proceeding but should be considered in this proceeding. The arrangement of allotments set forth herein is preferential, and would better serve the public interest.

Finally, in the event that the Counterproposal is granted, Radio Georgia, Inc. will file an application, if necessary, for the modification of Station WTGA-FM, Thomaston, Georgia, and construct the facilities authorized thereby at Milner, Georgia.

Respectfully submitted,

**RADIO GEORGIA, INC. AND
SOUTHERN BROADCASTING COMPANIES, INC.**

A handwritten signature in black ink, appearing to read "Gary S. Smithwick", is written over a horizontal line. To the left of the signature, the word "for" is written in a cursive script.

for Gary S. Smithwick
Their Counsel

Smithwick & Belendiuk, P.C.
5028 Wisconsin Avenue, N.W., #301
Washington, D.C. 20016
(202) 363-4050

May 9, 2005

TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL TO
MB DOCKET NO. 05-106

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TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL TO
MB DOCKET NO. 05-106

Technical Narrative

This Technical Exhibit, of which this Narrative is part, proposes a Counterproposal to the Rule Making in MB Docket No. 05-106.

All population data, unless otherwise noted, is based upon the 2000 Housing and Population Census. The determination of available reception services was based on the criteria set forth in footnote 1 of the Notice of Proposed Rule Making in MM Docket No. 96-219 (DA 96-1774; adopted October 25, 1996, released November 1, 1996). Urbanized area definitions are based upon the 2000 Census.

Summary of Rule Making Counterproposal

Below is a summary of the allocation changes requested in the counterproposal.

- Delete Channel 266A at Thomaston, Georgia and allot Channel 266A at Milner, Georgia.
- Allot Channel 290A at Oglethorpe, Georgia (MX Point to 05-106 NPRM).
- Allot Channel 295A at Plains, Georgia.¹
- Continued proposed substitution of Channel 232A for 290A at Ellaville, Georgia.²

¹ The Current proposal for Channel 295A at Americus and Oglethorpe (MB Docket No. 04-328) is mutually exclusive with the herein proposed Channel 295A allotment at Plains. The herein described counterproposal instead proposes Channel 290A for Oglethorpe.

² See MB Docket 05-106.

Proposed Channel 266A Milner, Georgia

It is proposed to delete Channel 266A at Thomaston, Georgia and reallocate Channel 266A to Milner, Georgia. There are currently no aural services assigned to Milner. The Milner proposal is mutually exclusive with the current Thomaston allotment. No urbanized areas are affected. Thomaston would have one remaining aural service, daytime-only station WTGA on 1590 kHz.

The attached Sheet 1 of Figure 2 is a tabulation of the required separations pertinent to the use of Channel 266A at Milner. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments with the exception of the licensed operation for WKHX-FM on channel 268C at Marietta, GA. However, WKHX-FM has already been authorized to downgrade to a Class C0 facility which is fully spaced to the herein proposed Milner Channel 266A allotment reference point³. Sheet 2 of Figure 2 is a coverage map showing the 70-dBu contour and the city limits of Milner.

Below are the proposed Channel 266A Milner, Georgia reference site geographic coordinates:

33° 01' 54" North Latitude
84° 17' 25" West Longitude

The Channel 266A service gain area would contain 66,856 persons over an area of 1,225 square kilometers. The loss area would contain 14,895 persons over 1,225 square kilometers. Sheet 3 of Figure 2 depicts the Milner

³ See authorization for WKHX-FM: BPH-20020403AAS; license application pending: BLH-20050228ADF

Gain/Loss areas. The total Channel 266A 60-dBu service area would contain 104,542 persons over 2,514 square kilometers as compared to the existing Channel 266A 60-dBu service area containing 52,581 persons over 2,514 square kilometers.

The other aural services that would serve the Channel 266A loss area are provided in Sheet 4 of Figure 2. The other aural services that would serve the Channel 266A gain area are provided in Sheet 5 of Figure 2. All of the loss and gain areas would have 5 or more aural services.

Proposed Channel 290A Oglethorpe, Georgia

It is proposed to allot Channel 290A to Oglethorpe, Georgia. There are currently no aural services assigned to Oglethorpe. Thus, the proposal will provide a first local aural service to Oglethorpe.⁴ No urbanized areas are affected.

The attached Sheet 1 of Figure 3 is a tabulation of the required separations pertinent to the use of Channel 290A at Oglethorpe. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, with the exception of the proposed allotments at Ellaville, Georgia and Plains, Georgia.⁵

⁴ It is proposed in MB Docket No. 04-328 to allot Channel 295A at Oglethorpe or Americus, Georgia. However, it is herein counterproposed to allot Channel 290A to Oglethorpe and Channel 295A to Plains, Georgia.

⁵ In MB Docket No. 05-106, it is proposed to substitute channel 232A for 290A at Ellaville and Channel 290A at Plains.

Below are the Channel 290A Oglethorpe, Georgia
reference site geographic coordinates:

32° 17' 43" North Latitude
84° 04' 40" West Longitude

The Channel 290A 60-dBu service area would
contain 35,149 persons over an area of 2,514 square
kilometers.

Proposed Channel 295A Plains, Georgia

It is proposed to allot Channel 295A to Plains,
Georgia. There are currently no aural services assigned
to Plains. Thus, the proposal will provide a first local
aural service to Plains. No urbanized areas are affected.
As already discussed, it is herein proposed to allot
Channel 295A to Plains instead of to Oglethorpe and
Americus.

The attached Sheet 1 of Figure 4 is a tabulation
of the required separations pertinent to the use of
Channel 295A at Plains. The proposed reference site
complies with the Commission's minimum distance separation
requirements contained in Section 73.207 to all existing,
authorized and proposed stations and allotments, with the
exception of the aforementioned Oglethorpe and Americus
proposals.

Below are the Channel 295A Plains, Georgia
reference site geographic coordinates:

32° 04' 33" North Latitude
84° 15' 49" West Longitude

The Channel 295A 60-dBu service area would contain 41,927 persons over an area of 2,514 square kilometers.

Proposed Channel 232A Ellaville, Georgia

It is proposed to substitute Channel 232A for Channel 290A at Ellaville, Georgia. The Channel 290A Ellaville assignment is a vacant allotment. There are currently no aural services assigned to Ellaville. Thus, the proposal will provide a first local aural service to Ellaville. No urbanized areas are affected.

The attached Sheet 1 of Figure 5 is a tabulation of the required separations pertinent to the use of Channel 232A at Ellaville. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments.

Below are the Channel 232A Ellaville, Georgia reference site geographic coordinates:

32° 16' 54" North Latitude
84° 09' 56" West Longitude

The Channel 232A 60-dBu service area would contain 45,261 persons over an area of 2,514 square kilometers.

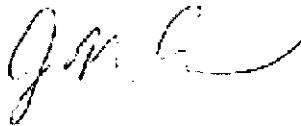
Proposed Modifications to Table of Allotments

This counterproposal provides for the following allotment changes to Section 73.202, The Commission's Table of FM Allotments.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Milner, GA	---	266A
Thomaston, GA	266A	---
Oglethorpe, GA	---	290A
Plains, GA	---	295A
Ellaville, GA	290A	232A

Analysis With Initial Proposal (MB05-106)

The initial proposal in MM Docket No. 05-106, proposes new service in two new communities, Milner and Plains, Georgia. The herein counterproposal proposed new service in three new communities, Milner, Plains and Oglethorpe, Georgia.



Jonathan N. Edwards

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941.329.6000

May 5, 2005

TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL

Summary of 60 dBu Service Gain/Loss Analysis
For Initial Proposal In MM Docket No. 05-106

Allotment	Loss Area (km ²)	Gain Area (km ²)	Loss Population	Gain Population
Milner, GA	---	2,514	---	120,772
Plains, GA	---	2,514	---	43,083
Ellaville, GA	2,514	2,514	46,488	45,682
Total:	2,514	7,542	46,488	209,537

The initial proposal would have a "net" gain of 163,049 persons and a "net" gain of 5,028 square kilometers.

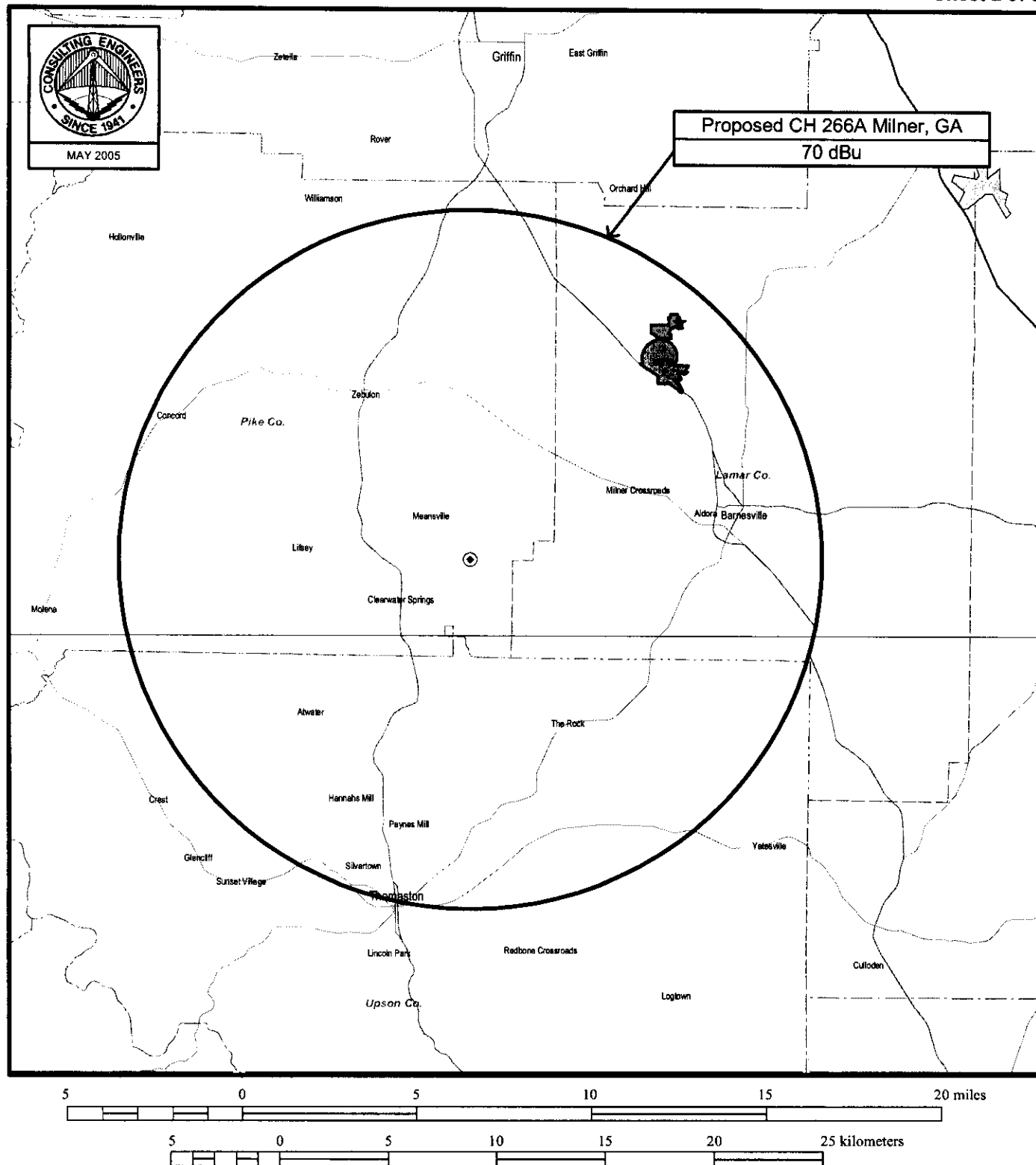
Summary of 60 dBu Service Gain/Loss
Analysis For Herein Counterproposal

Allotment	Loss Area (km ²)	Gain Area (km ²)	Loss Population	Gain Population
Ch 266A (Milner)	1,225	1,225	14,895	66,856
Oglethorpe, GA	---	2,514	---	35,149
Plains, GA	---	2,514	---	41,927
Ellaville, GA	---	2,514	---	45,261
Total:	1,225	4,900	14,895	189,193

The herein described counterproposal would have a "net" gain of 174,298 persons and a "net" gain of 3,675 square kilometers. The counterproposal will provide greater service to 11,249 persons in an area that is 1,353 less square kilometers than the initial proposal in MM Docket No. 05-106.

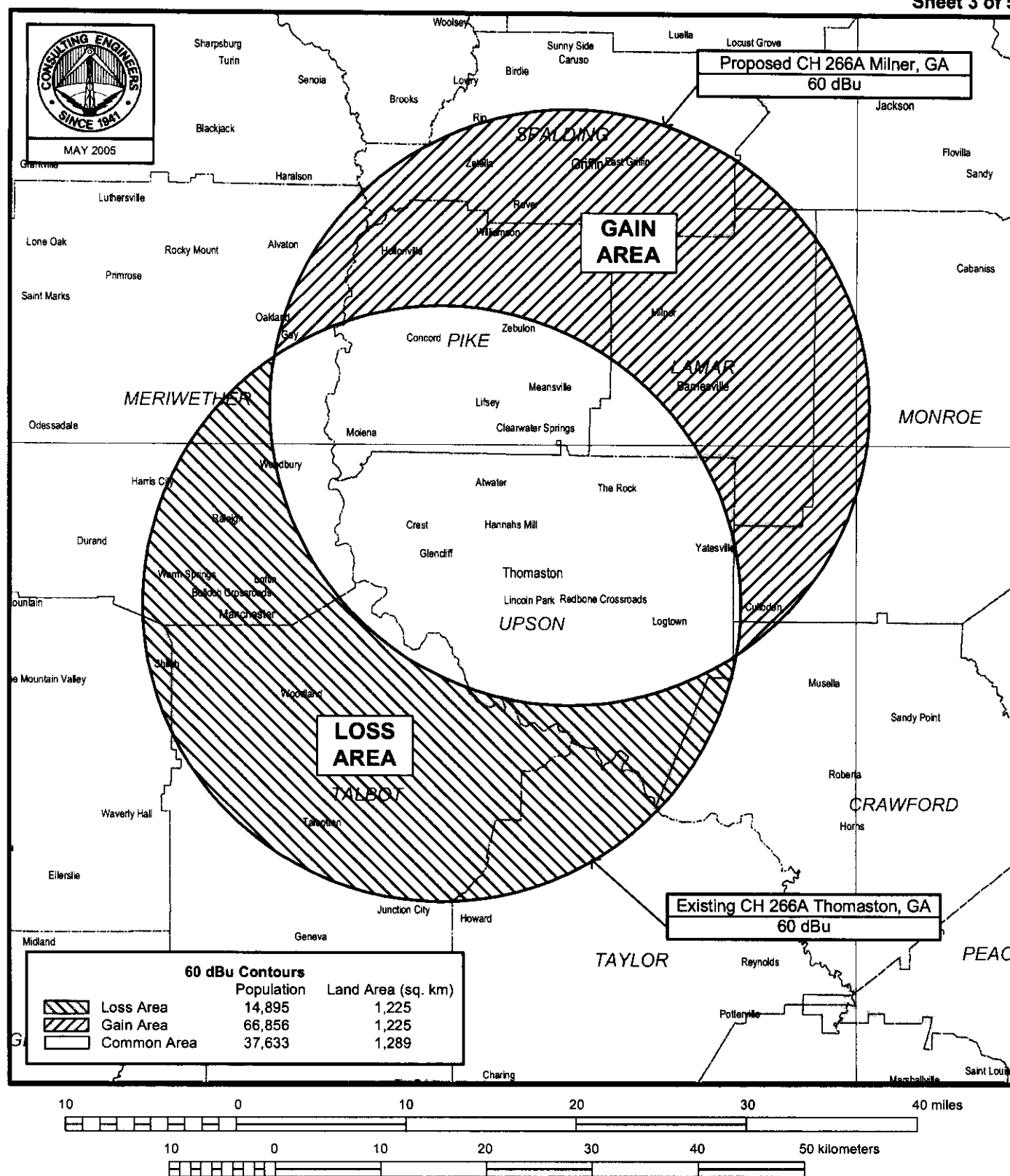
Note: Population based upon 2000 Census.

Call ID	City State	FCC File No.	Channel Freq.	ERP (kW) HAAT (m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WWWQ 6809	COLLEGE PARK BPH GA CP C	20030124AGK	263 C2 100.5	27 143	33-41-20 084-30-38	344.4	75.73	55.0
WPGA-FM 54726	PERRY BLH GA LIC C	19980811KB	265 A 100.9	3.3 136	32-33-20 083-44-14	135.5	73.97	72.0
WCJM-FM 54863	WEST POINT BLH GA LIC C	20020426AAZ	265 A 100.9	5.8 100	32-51-07 085-08-14	256.0	81.67	72.0
WTGA-FM 54590	THOMASTON BLH GA LIC C	19950818KD	266 A 101.1	6.0 94	32-51-49 084-25-10	212.9	22.21	
(Proposed to delete Channel 266A Thomaston Allotment. No allocation issue.)								
WQIL 25477	CHAUNCEY BLH GA LIC C	20011227AAJ	267 C2 101.3	50 150	32-22-59 083-07-08	123.0	131.29	106.0
WKHX-FM 73161	MARIETTA BPH GA CP C	20020403AAS	268 C0 101.5	100 329	33-48-26 084-20-22	357.0	86.14	86.0
WKHX-FM 73161	MARIETTA BLH GA LIC C	20001030ACG	268 C 101.5	100 300	33-48-27 084-20-27	356.9	86.18	95.0
(WKHX-FM has already been authorized to downgrade to Class C0. See previous WKHX-FM record.)								



PROPOSED MILNER 70 dBu COVERAGE CONTOUR **COUNTERPROPOSAL**

du Treil, Lundin & Rackley, Inc., Sarasota, Florida



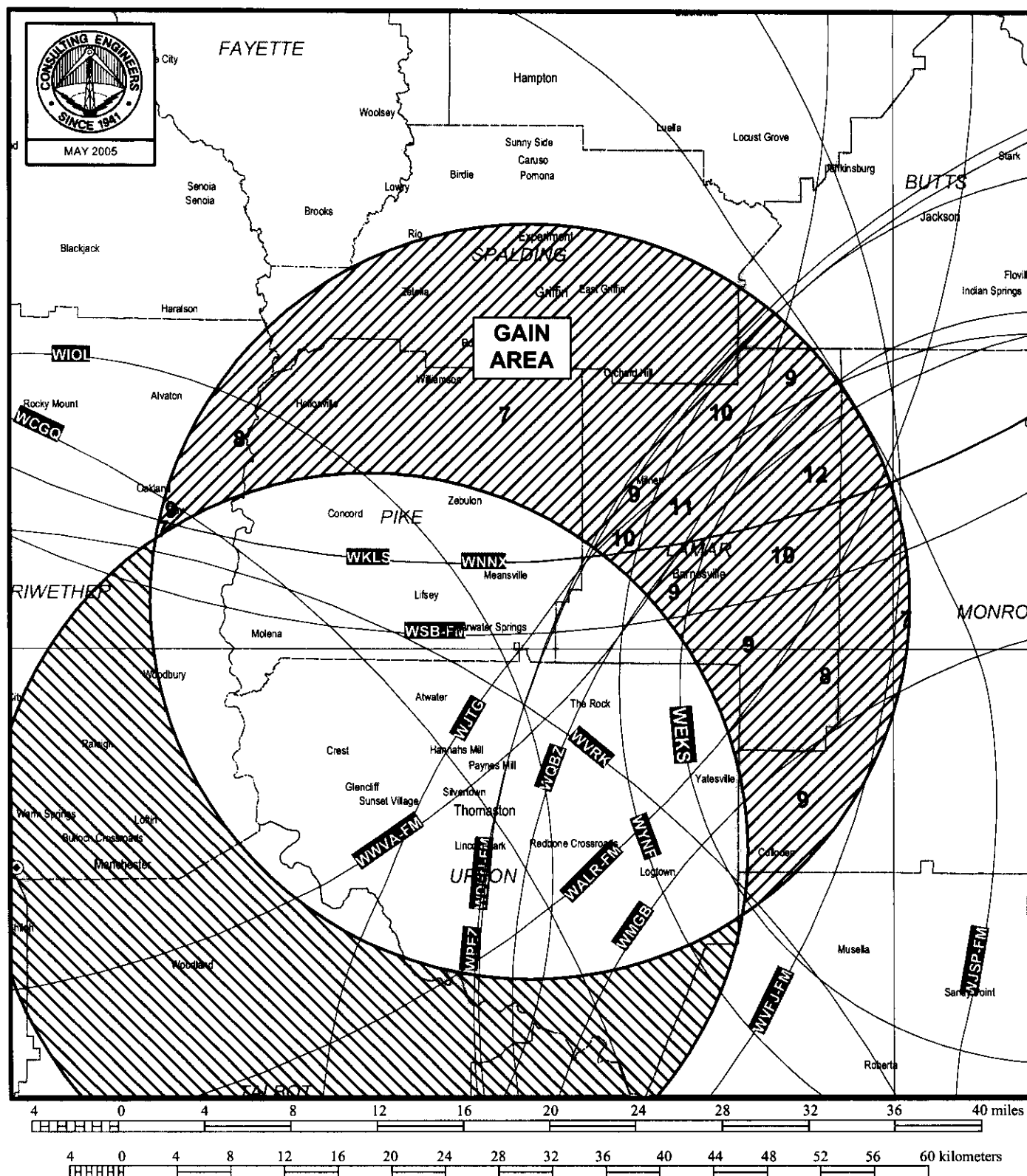
MILNER GAIN/LOSS AREA

PETITION FOR RULE MAKING

du Treil, Lundin & Rackley, Inc., Sarasota, Florida



du Treil, Lundin & Rackley, Inc., Sarasota, Florida



CHANNEL 266A GAIN AREA AND OTHER FULL TIME AURAL SERVICES

COUNTERPROPOSAL

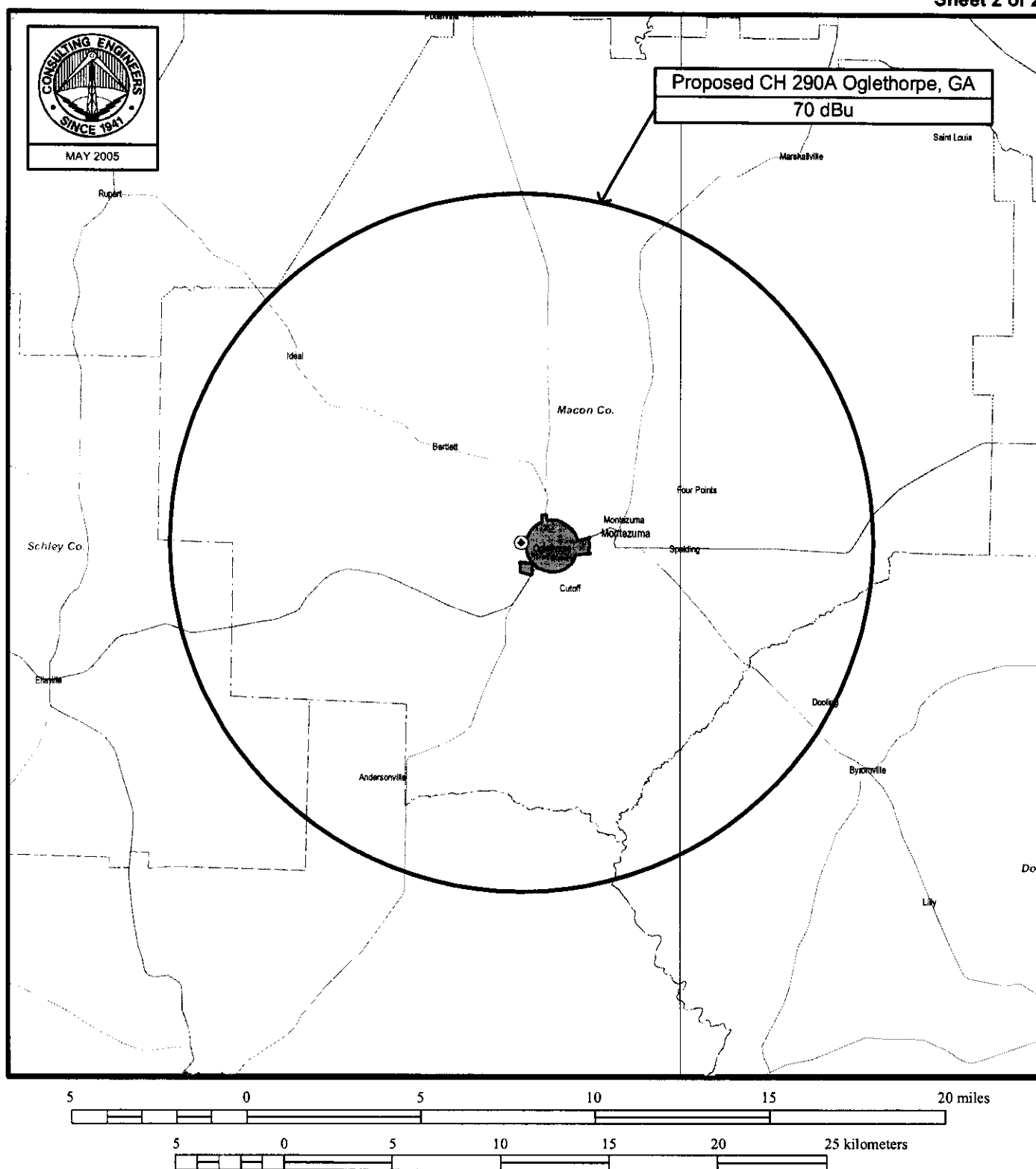
du Treil, Lundin & Rackley, Inc., Sarasota, Florida

TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL

Channel 290A Oglethorpe, Georgia Allocation Study

32° 17' 43" North Latitude
84° 04' 40" West Longitude

Call ID	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WMGB 88541	MONTEZUMA GA	BLH LIC C 20010810AAD	236 C2 95.1	46 119	32-33-20 083-44-14	47.7	3.12	15.0
WFFM 72056	ASHBURN GA	BMLH LIC C 19910802KB	289 A 105.7	6 100	31-41-17 083-38-38	148.7	78.83	72.0
	ELLAVILLE GA	RM VAC C 9906	290 A 105.9		32-11-55 084-13-15	231.4	17.22	115.0
<i>(Herein proposed to substitute Channel 232A for 290A at Ellaville.)</i>								
	PLAINS GA	RM ADD C 11196	290 A 105.9		32-06-51 084-16-10	221.9	27.02	115.0
<i>(Herein proposed to substitute Channel 295A for 290A at Plains.)</i>								
	MILNER GA	RM ADD C 11196	290 A 105.9		33-09-44 084-04-51	359.8	96.14	115.0
<i>(Initial Petition for Rulemaking proposal.)</i>								
WVGA 36379	LAKELAND GA	BLH LIC C 20021115AAB	290 C3 105.9	10 100	31-03-21 083-13-54	149.6	159.13	142.0
WRXZ 33058	SYLVESTER GA	BLH LIC C 19930208KJ	291 A 106.1	6 100	31-30-15 083-55-46	170.9	88.83	72.0
WSTH-FM 60763	ALEXANDER C AL	BLH LIC C 19950410KB	291 C1 106.1	86 319	32-45-30 085-28-20	291.9	140.71	133.0
WQBZ 64641	FORT VALLEY GA	BLH LIC C 19900921KD	292 C2 106.3	50 150	32-45-31 083-44-49	31.0	60.05	55.0
WZIQ 29130	SMITHVILLE GA	BLH LIC C 19960823KB	293 A 106.5	2.45 157	31-47-59 084-14-54	196.3	57.26	31.0



PROPOSED OGLETHORPE 70 dBu COVERAGE CONTOUR **COUNTERPROPOSAL**

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

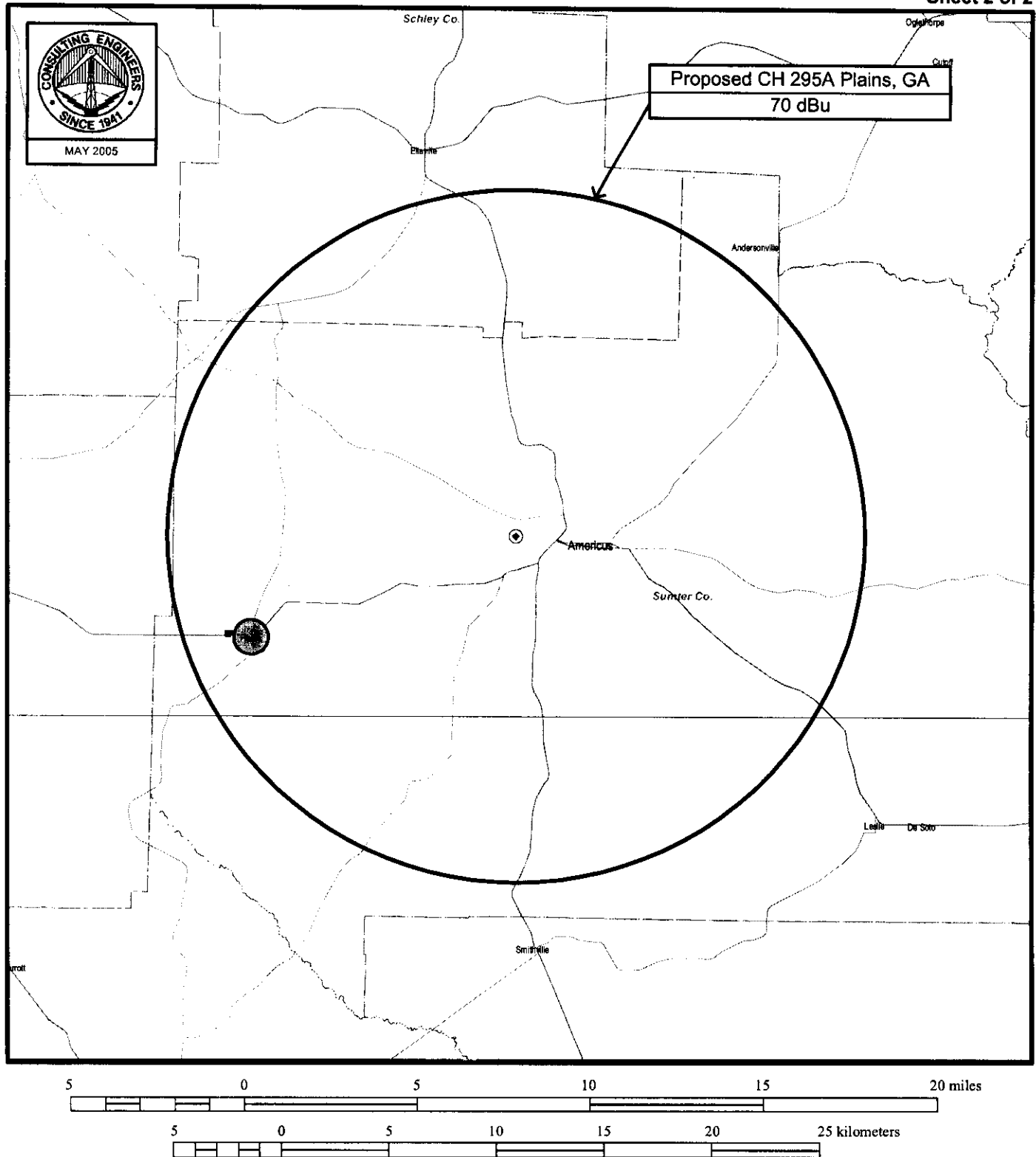
TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL

Channel 295A Plains, Georgia Allocation Study

32° 04' 33" North Latitude
84° 15' 49" West Longitude

Call ID	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WJIZ-FM 6616	ALBANY GA	BMLH LIC C 20031014AIE	242 C1 96.3	100 142	31-39-16 084-10-36	N 170.0	47.44	22.0
WZIQ 29130	SMITHVILLE GA	BLH LIC C 19960823KB	293 A 106.5	2.45 157	31-47-59 084-14-54	N 177.3	30.65	31.0
<i>(Separation distance rounds to 31 kilometers, therefore, no allocation issue.)</i>								
WOKA-FM 12203	DOUGLAS GA	BLH LIC C 20020314AAN	294 C1 106.7	100 299	31-40-21 082-51-28	N 108.3	140.34	133.0
WKMX 73179	ENTERPRISE AL	BLH LIC C 19870105KB	294 C 106.7	100 326	31-24-41 085-57-32	245.7	176.73	165.0
	AMERICUS GA	RM ADD C 11046	295 A 106.9		32-04-51 084-15-20	53.8	0.94	115.0
<i>(Proposed in MB Docket No. 04-328 to allot Channel 295A to Americus. It is herein proposed to allot Channel 295A to Plains.)</i>								
	OGLETHORPE GA	RM ADD C 11235*	295 A 106.9		32-15-58 084-06-25	34.8	25.76	115.0
<i>(Proposed in MB Docket No. 04-328 counterproposal to allot Channel 295A to Oglethorpe. It is herein proposed to allot Channel 295A to Plains.)</i>								
WTLY 61250	THOMASVILLE GA		296 C1 107.1		30-47-12 084-03-25	172.2	144.28	133.0
WCGQ 72089	COLUMBUS GA		297 C0 107.3		32-27-59 085-03-23	300.4	86.34	86.0
WCGQ 72089	COLUMBUS GA	BLH LIC C 19861124KA	297 C0 107.3	100 308	32-27-59 085-03-23	300.4	86.34	86.0

Figure 4
Sheet 2 of 2



PROPOSED PLAINS 70 dBu COVERAGE CONTOUR
COUNTERPROPOSAL

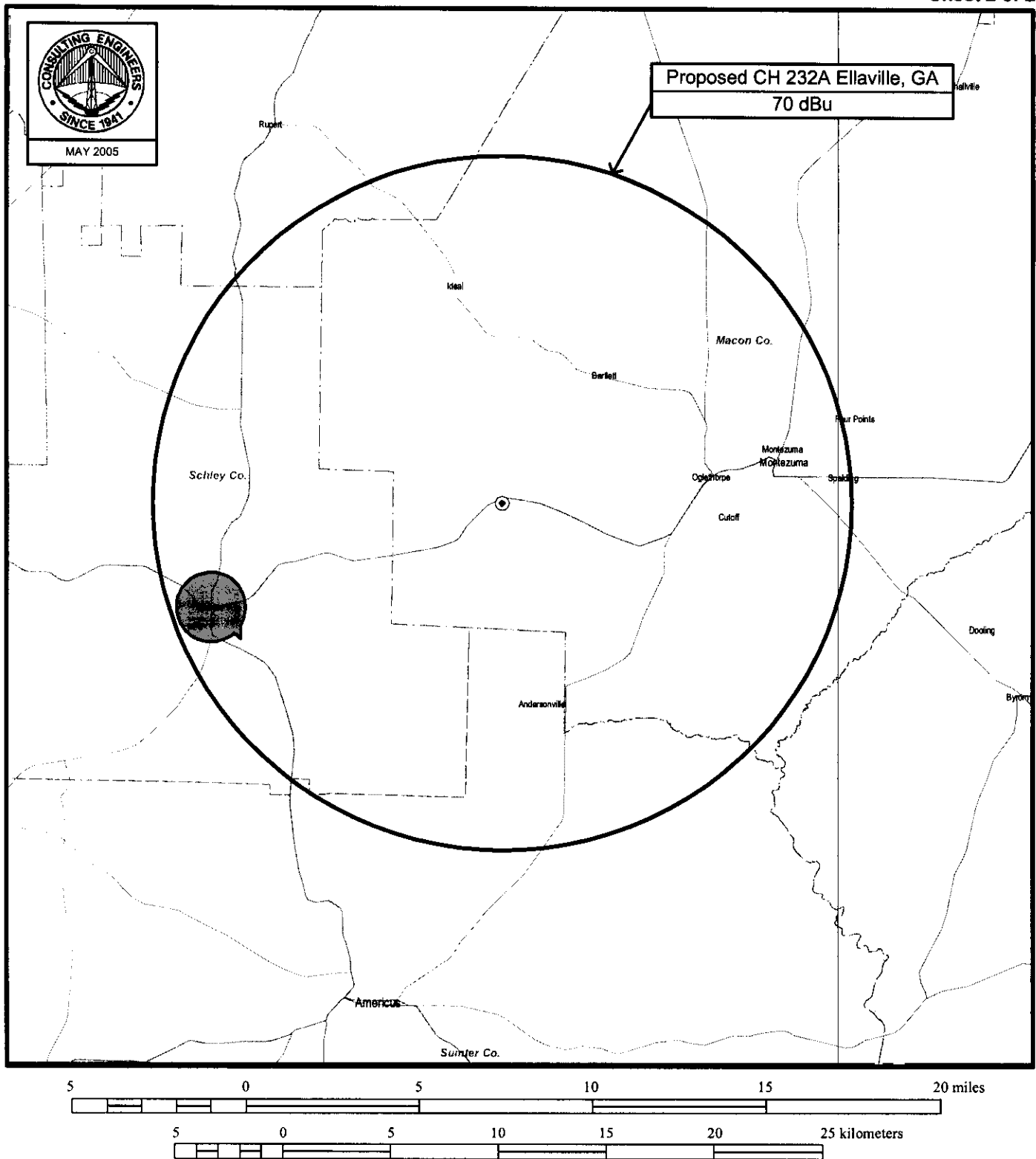
du Treil, Lundin & Rackley, Inc., Sarasota, Florida

TECHNICAL EXHIBIT
IN SUPPORT OF A COUNTERPROPOSAL

Channel 232A Ellaville, Georgia Allocation Study

32° 16' 54" North Latitude
84° 09' 56" West Longitude

Call ID	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WPEZ 52551	JEFFERSONVI GA	BLH LIC C 20020529ABR	229 C1 93.7	100 207	32-45-12 083-33-46	47.0	77.09	75.0
WSTR 30822	SMYRNA GA	BLH LIC C 19890929KD	231 C 94.1	100 311	33-45-35 084-20-07	354.5	164.68	165.0
<i>(Separation distance rounds to 165 kilometers, therefore, no allocation issue.)</i>								
	ELLAVILLE GA	RM ADD C 11196	232 A 94.3		32-16-20 084-09-26	143.3	1.31	115.0
<i>(Continued substitution of Channel 232A for 290A at Ellaville proposed herein, except that a better suited Ellaville reference point has been suggested.)</i>								
	OPELIKA AL	RM ADD C spm167	232 A 94.3		32-42-59 085-23-22	293.2	124.71	115.0
WIZB 23615	ABBEVILLE AL	BLH LIC C 19961001KB	232 C3 94.3	19.5 113	31-26-19 085-17-22	228.8	141.60	142.0
<i>(Separation distance rounds to 142 kilometers, therefore, no allocation issue.)</i>								
WBYZ 61095	BAXLEY GA	BLH LIC C 19880719KA	233 C 94.5	100 309	31-47-10 082-27-03	108.4	171.04	165.0
WDEC-FM 63786	AMERICUS GA	BLH LIC C 19960401KA	234 C3 94.7	25 100	31-53-52 084-18-53	198.3	44.84	42.0



PROPOSED ELLAVILLE 70 dBu COVERAGE CONTOUR **COUNTERPROPOSAL**

du Treil, Lundin & Rackley, Inc., Sarasota, Florida


CERTIFICATE OF SERVICE

I, Sherry L. Schunemann, a secretary in the law offices of Smithwick & Belendiuk, P.C., do hereby certify that a copy of the foregoing "Joint Counterproposal" was mailed by First Class U.S. Mail, postage prepaid, or hand delivered as marked with an asterisk, this 9th day of May, 2005, to the following:

*Ms. Rolanda F. Smith
FCC Audio Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

SSR Communications, Inc.
5270 West Jones Bridge Road
Norcross, GA 30092-1628
(Proponent in MB Docket No. 04-328)

Ms. Linda A. Davidson
2134 Oak Street, Unit C
Santa Monica, California 90405


Sherry L. Schunemann